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★ FEB 08 2019 ★



ORIGINAL  
LONG ISLAND OFFICE

SLR:DCL  
F. #2018V02469

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

Plaintiff,

- against -

FORTY THOUSAND FIVE HUNDRED  
THIRTY DOLLARS AND ZERO CENTS  
(\$40,530.00), MORE OR LESS, IN UNITED  
STATES CURRENCY, AND ALL PROCEEDS  
TRACEABLE THERETO,

Defendant in rem.

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Plaintiff, United States of America, by its attorney, RICHARD P.  
DONOGHUE, United States Attorney for the Eastern District of New York, Diane C.  
Leonardo, Assistant United States Attorney, of counsel, alleges upon information and belief  
as follows:

**NATURE OF THE ACTION**

1. This is a civil action in rem brought by the United States of America to  
forfeit and condemn to the use and benefit of the United States the above-captioned defendant  
United States currency, in the amount of FORTY THOUSAND FIVE HUNDRED THIRTY  
DOLLARS AND ZERO CENTS (\$40,530.00), more or less, and all proceeds traceable thereto  
(the "Defendant Funds"), which were seized on or about June 16, 2018, from Jordan M.  
Goddard ("Goddard") at the residence located on Deepdale Drive, in Commack, New York

VERIFIED COMPLAINT  
IN REM  
**CV-19 0801**  
Civil Action No.

**FEUERSTEIN, J.**

(the “Deepdale Drive Premises”).

2. The Defendant Funds are subject to forfeiture to the United States pursuant to 21 U.S.C. § 881(a)(6).

### **JURISDICTION AND VENUE**

3. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1345 and 1355.

4. Venue lies in the Eastern District of New York pursuant to 28 U.S.C. §§ 1355 and 1395 in that the acts and omissions giving rise to the forfeiture occurred in the Eastern District of New York.

### **STATUTORY BACKGROUND**

5. Pursuant to 21 U.S.C. § 881(a)(6), all moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of the Controlled Substance Act, 21 U.S.C. § 881 *et seq.* (the “CSA”), all proceeds traceable to such an exchange, and all moneys, negotiable instruments, and securities used or intended to be used to facilitate a violation of the CSA, are subject to forfeiture to the United States.

### **FACTS**

6. On June 16, 2018, at approximately 2:50 a.m., members of the Long Island Heroin Task Force (“LIHTF”) observed Goddard seated alone in his black Dodge, bearing New York registration HNZ4062.

7. Upon approaching the black Dodge, task force member Suffolk County Police Department Detective Daniel Murphy (“Det. Murphy”) observed in plain view vacuum-sealed packets containing Xanax. Det. Murphy requested permission from Goddard to search

the black Dodge and Goddard gave his consent.

8. During the search, Det. Murphy located inside in the vehicle approximately 3000 Xanax bars in vacuum-sealed packaging.

9. Upon being questioned about the Xanax pills, Goddard informed Det. Murphy that he had another approximately 1000 pills of Xanax stored in his bedroom at the Deepdale Drive Premises. When asked if they could search his bedroom, Goddard consented to the search.

10. At approximately 3:09 a.m., members of the LIHTF and Goddard entered the Deepdale Drive Premises. The search of Goddard's bedroom resulted in the seizure of \$40,530.00 in United States currency and approximately 1,500 Xanax bars, along with several scales.

11. Goddard was placed under arrest for possession of a controlled substance.

12. Subsequently, Goddard gave a written statement to police in which he admitted that the Xanax pills were his and that he sells them.

13. The Defendant Funds, totaling \$40,530.00, were comprised of the following denominations: 181-\$100 bills; 51-\$50 bills; 980-\$20 bills; 26-\$10 bills; and 4-\$5 bills. Drug dealers largely conduct their transactions in cash and the sizeable number of \$20 bills is consistent with narcotics proceeds.

14. Shortly after the seizure of the Defendant Funds, a law enforcement canine trained to detect narcotics alerted to the presence of narcotics on the Defendant Funds.

15. On or about August 1, 2018, the DEA sent notice of the seizure of the Defendant Funds to all potential claimants.

16. On or about September 4, 2018, Tami Bohm, by and through her attorney, filed a claim to the Defendant Funds. The matter was then referred to the United States Attorney's Office for the Eastern District of New York for initiation of this civil in rem action.

**CLAIM FOR RELIEF**

17. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1 through 16, as if fully set forth herein.

18. The Defendant Funds constitute moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of the CSA, proceeds traceable to such an exchange, and/or moneys, negotiable instruments, and securities used or intended to be used to facilitate such a violation of the CSA.

19. As a result of the foregoing, the Defendant Funds are liable to condemnation and forfeiture to the United States in accordance with the provisions of 21 U.S.C. § 881(a)(6).

WHEREFORE, plaintiff United States of America requests that a warrant of this Court be issued for the arrest of the Defendant Funds; that due notice of these proceedings be given to all interested persons; that the Defendant Funds be forfeited and condemned to the

use of the United States; that the Plaintiff be awarded its costs and disbursements in this action, and for such other and further relief as the Court may deem just and proper.

Dated: Central Islip, New York  
February 8, 2019

RICHARD P. DONOGHUE  
UNITED STATES ATTORNEY  
*Attorney for Plaintiff*  
Eastern District of New York  
610 Federal Plaza  
Central Islip, New York 11722

By: /s/Diane C. Leonardo  
Diane C. Leonardo C. Leonardo  
Assistant United States Attorney  
(631) 715-7854

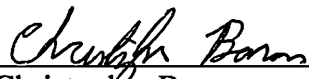
**VERIFICATION**

Christopher Baron hereby declares as follows:

1. I am a Task Force Officer with the Drug Enforcement Administration.
2. I have read the verified complaint in rem in this action and know the contents thereof.
3. The matters contained in the within verified complaint in rem are true and accurate to the best of my knowledge, information and belief.
4. The source of my information and the grounds for my belief are my personal knowledge, information provided by other law enforcement officers, and the official files and records of the Drug Enforcement Administration and other law enforcement agencies.

I declare under penalty of perjury that the foregoing is true, to the best of my knowledge, information, and belief.

Dated: Central Islip, New York  
February 8, 2019

  
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Christopher Baron  
Task Force Officer  
Drug Enforcement Administration